

### **III. REMARKS**

Applicant has considered the current Office Action with mailing date of May 1, 2007. Claims 1-32 are pending in this application. By this amendment, claims 1, 11 and 22 have been amended. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Office, as the present claim amendments are only for facilitating expeditious prosecution of the application. Applicant does not acquiesce in the correctness of the rejections and reserves the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicant respectfully reserves the right to pursue the full scope of the subject matter of these original claims and other claims in one or more subsequent patent application that claim(s) priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 1-32 are rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over US 20020120918, hereinafter “Aizenbud”, in view of US Patent No. 6732153, hereinafter “Jakobson.” Applicant respectfully submits the following for the Office’s reconsideration.

#### **REJECTION OF CLAIMS 1-32 UNDER 35 U.S.C. §103(a)**

With regard to the 35 U.S.C. §103(a) rejection of claims 1 – 32 over Aizenbud in view of Jakobson, Applicant respectfully submits that Aizenbud independently or in combination with Jakobson does not teach or suggest each and every feature of the claimed invention. In addition to the previous arguments filed on February 13, 2007, Applicant submits that Aizenbud does not teach, *inter alia*, “... providing the message, wherein the message is crafted in a natural language;

configuring a review standard for reviewing linguistic aspects of the natural language used in crafting the message;...”, claim 1.

The current amendment in claim 1 distinctly sets out that the language used for crafting the claimed “message delivered to an end-user...is...a natural language”. Specifically, natural language is defined as: “[a] language spoken or written by humans, as opposed to a language use to program or communicate with computers. Natural language understanding is one of the hardest problems of artificial intelligence due to the complexity, irregularity and diversity of human language and the philosophical problems of meaning.” Free Online Dictionary of Computing, <http://foldoc.org/?natural+language>. According to page 3 of the current Office Action, “...the two references[, Aizenbud and Jakob,] are concerned with the solution to problem of messaging associated with computer program code...”. Since Aizenbud’s input message is a coded message for communication between machines/computers, it cannot be written in a natural language. As such, the coded message in Aizenbud is not an equivalent of the claimed message. Consequently, consideration for a review standard of a coded message cannot be the same as that for a message written in natural language. To this extent, the review standard for a message written in natural language is based on “...linguistic aspects of the natural language used in crafting the message...” and not logic of the codes of machine language used in crafting Aizenbud’s messages. Without being equal, no nexus exist between a review standard for a message written in natural language and a review standard for a message written in machine codes. Therefore, there is no basis for comparison of the teachings in the two references and the claimed invention. Accordingly, Applicant respectfully requests that the Office withdraw this rejection.

In addition to the above, the Office asserts that “the limitation, linguistic aspects [added in claim 1], are simply aspects relating to language (See Merriam Webber definition of linguistic), thus

the review standard is simply for reviewing the language of the message”. Page 8 of the current Office Action. However, linguistic as defined in Merriam Webber, <http://www.m-w.com/dictionary/linguistics>, is “the study of human speech including the units, nature, structure, and modification of language”. Another definition concurring with this definition states that “linguistic may refer to: (i) natural language, human language that is spoken, written, or signed for general communication...”. Wikipedia, <http://en.wikipedia.org/wiki/Linguistic>. From these definitions, “linguistics” is directed to language for human appreciation/comprehension and not any other form of language, for example, machine codes for system operations disclosed in Aizenbud and Jakob. To this extent, the “...review standard for reviewing linguistic aspects...” in claim 1 is specifically directed to the construct of natural language used to craft the claimed message for the end user and not system language (i.e., codes for machine interpretation) in Aizenbud and Jakob. As such, the review standard so defined is not equivalent to the Aizenbud’s method. Therefore, the Office has not established *prima facie* obviousness. Accordingly, Applicant respectfully requests that the Office withdraw this rejection.

With respect to dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claim 1 from which claims 2 – 10 depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection.

Applicant further incorporates the foregoing arguments with regard to the 35 U.S.C. §103(a) rejection of subject matter in system claims 11 – 20 and computer product claims 22 – 32, which are similar to subject matter in claims 1 - 10. Accordingly, Applicant respectfully requests that the Office withdraw the rejections of all claims.

#### IV. CONCLUSION

In addition to the above arguments, Applicant submits that each of the pending claims is patentable for one or more additional unique feature. To this extent, Applicant does not acquiesce to the Office's interpretation of the claimed subject matter or the use of references independently or in combination and/or modifications in rejecting the claimed subject matter. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

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